

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WISCONSIN

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SHANE GRESSEL,

Plaintiff,

v.

Case No. 15-CV-180

JAMES THORPE, et al.,

Defendants.

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**DEFENDANTS' PROPOSED ADDITIONAL VOIR DIRE**

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In addition to this Court's standard voir dire questions, Defendants submit the following proposed voir dire questions for use in selecting the jury.

1. Have you or any relatives or close friends ever been confined in jail or prison?
2. Have you ever visited a jail or prison?
3. Have you read any online or print news stories regarding the Wisconsin Department of Corrections in the last two years?
  - a. Have you formed any opinions about Wisconsin DOC personnel as a result of the articles?

If a potential juror answers "yes" to this question, Defendants request that the following additional voir dire be conducted through individual sidebar so as not to taint the jury pool:

- b. What articles?
- c. Would the content of the articles make it difficult for you to sit as an impartial juror?

4. Have you or any members of your family or close friends ever been employed by the Department of Corrections or in any other correctional setting?
5. Have you formed any opinions about the correctional system or the appropriateness of confining people in jail or prison?
6. Have you or any of your family members or close friends ever been employed by or volunteered in any aspect of criminal defense work, including at with a Public Defender's office, a Legal Aid office, or with any type of support or advocacy group for those charged with or convicted of crimes?
7. Have you ever had a negative experience dealing with a dentist?

If yes, would that experience make it difficult for you to sit as an impartial juror on a case involving the actions of a dentist?

8. Have you ever had a negative experience dealing with a state employee or law enforcement officer?

If yes, would that experience make it difficult for you to sit as an impartial juror on a case involving the actions of state correctional employees?

9. The Defendants are represented by the Wisconsin Department of Justice. Is there anyone who has negative feelings about that Department or the Attorney General?

Dated this 20th day of September, 2017.

Respectfully submitted,

BRAD D. SCHIMEL  
Wisconsin Attorney General

s/Shannon A. Conlin  
Shannon A. Conlin  
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